

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JULIO TOLEDO, JOSH C. HAYGOOD, RAFAEL VEGA,
GREG MCCAIN, MARTIN SANTA, DAVID FRANCO, JUAN
R. ESTRADA, KEVIN BELL, HOWARD LOCKWOOD,
JASON E. LARRIER, TOMMIE O. HART, ANGEL PEREZ,
PEDRO R. MENDEZ, LEONARD MATOS, JR., and
HERMINIO RIVAS, JR.,

Plaintiffs,

V.

C.A. No. 04-30163-MAP

IBPO, LOCAL 364,

Defendant,

V.

SPRINGFIELD POLICE DEPARTMENT,

Defendant.

**PLAINTIFFS' ASSENTED-TO MOTION FOR
FOUR-WEEK EXTENSION TO RESPOND TO MOTIONS TO DISMISS**

The plaintiffs move for a further extension of four weeks (*i.e.*, until May 10, 2005) to respond to the motion to dismiss filed by the defendants. In support thereof, the plaintiffs state:

1. On February 22, 2005, the undersigned attorneys from Wilmer Cutler Pickering Hale and Dorr LLP and the Lawyers' Committee for Civil Rights Under Law of the Boston Bar Association entered their appearance on behalf of the plaintiffs. Since that time, counsel has been collecting and analyzing data regarding the composition of the Springfield Police Department and other information necessary to respond to the legal and factual arguments presented by the defendants.

2. The plaintiffs have requested a meeting with the defendants to discuss the possibility of resolving this matter. The defendants have agreed to the request, and the parties are currently in the process of scheduling a meeting to occur within the next four weeks. Accordingly, the plaintiffs require an additional four weeks to meet with the defendants, and if necessary, to respond to the motions to dismiss filed by the defendants.

3. It is believed that the requested extension will cause no prejudice or harm to the defendants.

4. The defendants have assented to this motion.

WHEREFORE, the plaintiffs respectfully request that the Court grant their motion for an extension of four weeks to respond to the motion to dismiss filed by the defendants.

JULIO TOLEDO, JOSH C. HAYGOOD, RAFAEL VEGA, GREG MCCAIN, MARTIN SANTA, DAVID FRANCO, JUAN R. ESTRADA, KEVIN BELL, HOWARD LOCKWOOD, JASON E. LARRIER, TOMMIE O. HART, ANGEL PEREZ, PEDRO R. MENDEZ, LEONARD MATOS, JR., and HERMINIO RIVAS, JR.,

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Dated: April 12, 2005

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served on the following attorneys of record for each party by first class mail and/or fax:

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